

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

ROBERT T. BROCKMAN§
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§
§**Criminal No. 4:21-cr-00009**

DEFENDANT’S AMENDED EXHIBIT LIST FOR COMPETENCY HEARING

Exh. #	Document Identifier	Description	Admitted
DX-1	Brockman_0000105	Email exchange between Brockman and Dr. Yudofsky, May 3 – 4, 2017	Y
DX-2	UCSH 0208677	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2017	Y
DX-2A	UCSH 0208677	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2017 (clip 7:37 – 9:09)	Y
DX-3	UCSH 0212043	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2019	Y
DX-3A	UCSH 0212043	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2019 (clip 1:26 – 3:18)	Y
DX-4	Brockman_0000573 – Brockman_0000794; Brockman_0000795 – Brockman_0001006	Drs. Denney and Dietz, Transcripts of Examination, May 18, 2021 and May 20, 2021	Y (filed under seal)
DX-5	Brockman_0001980 – Brockman_0002024	Dr. Park Dietz, Paginated Report, June 2021	Y
DX-6	Brockman_0000157 – Brockman_0000218	Drs. Robert Denney and Park Dietz, Transcript of Examination, October 20, 2021	Y (filed under seal)

Exh. #	Document Identifier	Description	Admitted
DX-7	Brockman_0000468 – Brockman_0000572	Dr. Ryan Darby, Transcript of Examination, May 5, 2021	Y (filed under seal)
DX-8	DRD-0000041 – DRD-0000046	Dr. Ryan Darby, Neuroreader Report, August 20, 2021	Y
DX-9	Brockman_0002081 – Brockman_0002122	Dr. Marc Agronin, Curriculum Vitae	Y
DX-10	RTBrockman_Medical_Records_0002180; RTBrockman_Medical_Records_0002181	Dr. Marc Agronin, Videos of Examination, July 11, 2021	Y (filed under seal)
DX-10A	RTBrockman_Medical_Records_0002180; RTBrockman_Medical_Records_0002181	Dr. Marc Agronin, Videos of Examination, July 11, 2021 (clip – DX-11 transcript pg. 11:15 – 13:14)	Y
DX-10B	RTBrockman_Medical_Records_0002180; RTBrockman_Medical_Records_0002181	Dr. Marc Agronin, Videos of Examination, July 11, 2021 (clip – DX-11 transcript pg. 24:3 – 24:23)	Y
DX-10C	RTBrockman_Medical_Records_0002180; RTBrockman_Medical_Records_0002181	Dr. Marc Agronin, Videos of Examination, July 11, 2021 (clip – DX-11 transcript pg. 101:7 – 101:20)	Y
DX-10D	RTBrockman_Medical_Records_0002180; RTBrockman_Medical_Records_0002181	Dr. Marc Agronin, Videos of Examination, July 11, 2021 (clip – DX-11 transcript pg. 21:13 – 21:25)	Y
DX-11	RTBrockman_Medical_Records_0001952 – RTBrockman_Medical_Records_0002065	Dr. Marc Agronin, Transcript of Examination, July 11, 2021	Y (filed under seal)
DX-12	S.D. Tex. Dkt. No. 102	Dr. Marc Agronin, Expert Report, August 6, 2021	Y
DX-13	RTBrockman_Medical_Records_0006239; RTBrockman_Medical_Records_0006241	Dr. Marc Agronin, Videos of Examination, October 3, 2021	Y (filed under seal)

Exh. #	Document Identifier	Description	Admitted
DX-13A	RTBrockman_Medical_Records_0006239; RTBrockman_Medical_Records_0006241	Dr. Marc Agronin, Videos of Examination, October 3, 2021 (clip – DX-14 pg. 36:14 – 38:13)	Y
DX-13B	RTBrockman_Medical_Records_0006239; RTBrockman_Medical_Records_0006241	Dr. Marc Agronin, Videos of Examination, October 3, 2021 (clip – DX-14 pg. 38:19 – 39:13)	Y
DX-14	Brockman_0000219 – Brockman_0000261	Dr. Marc Agronin, Transcript of Examination, October 3, 2021	Y (filed under seal)
DX-15	S.D. Tex. Dkt. No. 172	Dr. Marc Agronin, Supplemental Expert Report, October 29, 2021	Y
DX-16	Brockman_0002067 – Brockman_0002080	Dr. Thomas Guilmette, Curriculum Vitae	Y
DX-17	RTBrockman_Medical_Records_0002389; RTBrockman_Medical_Records_0002390	Dr. Thomas Guilmette, Videos of Examination, July 13, 2021	Y (filed under seal)
DX-18	RTBrockman_Medical_Records_0002182 – RTBrockman_Medical_Records_0002250	Dr. Thomas Guilmette, Transcript of Examination, July 13, 2021	Y (filed under seal)
DX-19	S.D. Tex. Dkt. No. 101	Dr. Thomas Guilmette, Expert Report, August 6, 2021	Y
DX-20	RTBrockman_Medical_Records_0006240; RTBrockman_Medical_Records_0006242	Dr. Thomas Guilmette, Videos of Examination, October 2, 2021	Y (filed under seal)
DX-21	Brockman_0000262 – Brockman_0000286	Dr. Thomas Guilmette, Transcript of Examination, October 2, 2021	Y (filed under seal)
DX-22	S.D. Tex. Dkt. No. 173	Dr. Thomas Guilmette, Supplemental Expert Report, October 29, 2021	Y
DX-23	Brockman_0002126 – Brockman_0002174	Dr. Thomas Wisniewski, Curriculum Vitae	Y
DX-24	S.D. Tex. Dkt. No. 99	Dr. Thomas Wisniewski, Expert Report, August 6, 2021	Y

Exh. #	Document Identifier	Description	Admitted
DX-25	RTBrockman_Medical_Records_0006247; RTBrockman_Medical_Records_0006248	Dr. Thomas Wisniewski, Videos of Examination, October 17, 2021	Y (filed under seal)
DX-26	Brockman_0000423 – Brockman_0000463	Dr. Thomas Wisniewski, Transcript of Examination, October 17, 2021	Y (filed under seal)
DX-27	S.D. Tex. Dkt. No. 175	Dr. Thomas Wisniewski, Supplemental Expert Report, October 29, 2021	Y
DX-28	Brockman_0002025 – Brockman_0002066	Dr. Christopher Whitlow, Curriculum Vitae	Y
DX-29	S.D. Tex. Dkt. No. 100	Dr. Christopher Whitlow, Expert Report, August 6, 2021	Y
DX-30	S.D. Tex. Dkt. No. 174	Dr. Christopher Whitlow, Supplemental Expert Report, October 29, 2021	Y
DX-31	Brockman_0002123 – Brockman_0002125	Scott Polus, Curriculum Vitae	Y
DX-32	S.D. Tex. Dkt. No. 97	Scott Polus, Expert Report, August 6, 2021	Y
DX-33	-	Dr. Maria Ponisio, Curriculum Vitae	Y
DX-34	-	Dr. Maria Ponisio, Presentation titled “Representative Images RB Case,” October 30, 2021	Y
DX-35	S.D. Tex. Dkt. No. 98	Dr. Michelle York, Expert Report, August 6, 2021	Y
DX-36	BCM-0000791 – BCM-0000795 (excerpt from BCM-0000001 – BCM-0001467)	Baylor College of Medicine, Robert T. Brockman MRI, November 2, 2018	Y (filed under seal)
DX-37	BCM-0000743 – BCM-0000751 (excerpt from BCM-0000001 – BCM-0001467)	Baylor College of Medicine, Robert T. Brockman DaTscan, February 14, 2019	Y (filed under seal)
DX-38	HMH-0000004 – HMH-0000160	Houston Methodist Hospital Medical Records from January 2020 – March 2021	Y (filed under seal)

Exh. #	Document Identifier	Description	Admitted
DX-39	HMH-0000001 – HMH-0000002	Houston Methodist Hospital, Robert T. Brockman FDG-PET Report, March 12, 2021	Y
DX-40	RTBrockman_Medical_ Records_0004875 – RTBrockman_Medical_ Records_0005048	Dr. James L. Pool, Examination Notes, June 14, 2021	Y (filed under seal)
DX-41	RTBrockman_Medical_ Records_0002406 – RTBrockman_Medical_ Records_0002579; RTBrockman_Medical_ Records_0002397 – RTBrockman_Medical_ Records_0002402; RTBrockman_Medical_ Records_0002395 – RTBrockman_Medical_ Records_0002396; RTBrockman_Medical_ Records_0002403 – RTBrockman_Medical_ Records_0002405	Medical Records from June 24, 2021, Procedure	Y (filed under seal)
DX-42	RTBrockman_Medical_ Records_0001798 – RTBrockman_Medical_ Records_0001799	Houston Methodist Hospital, Robert T. Brockman Amyloid PET Scan Report, July 28, 2021	Y
DX-43	RTBrockman_Medical_ Records_0001778 – RTBrockman_Medical_ Records_0001779	Houston Methodist Hospital, Robert T. Brockman MRI, July 30, 2021	Y
DX-44	RTBrockman_Medical_ Records_0006333 – RTBrockman_Medical_ Records_0006338	Neuroreader Report of Robert T. Brockman Brain Scan, July 30, 2021	Y
DX-45	RTBrockman_Medical_ Records_0005257 – RTBrockman_Medical_ Records_0005258	Houston Methodist Hospital, Robert T. Brockman FDG-PET Report, August 24, 2021	Y

Exh. #	Document Identifier	Description	Admitted
DX-46	RTBrockman_Medical_Records_0005711 – RTBrockman_Medical_Records_0005713	Houston Methodist Hospital, Robert T. Brockman Electrophysiology Records, September 2, 2021	Y
DX-47	RTBrockman_Medical_Records_0005714 – RTBrockman_Medical_Records_0005773	Houston Methodist Hospital, Records from September 15 – 18, 2021, Hospitalization	Y (filed under seal)
DX-48	RTBrockman_Medical_Records_0005774 – RTBrockman_Medical_Records_0005775; RTBrockman_Medical_Records_0005776 – RTBrockman_Medical_Records_0005780	Email from Dr. James Pool to Kathy Keneally attaching Dr. Eugene Lai Neurology Examination Notes, October 7, 2021	Y (filed under seal)
DX-59	DBD-0000124 (excerpt from DBD-0000124 – DBD-0000126)	WMT Test Interpretive Flow Sheet, administered by Denney on May 19, 2021	Y
DX-60	DBD-0000075 (excerpt from DBD-0000075 – DBD0000076)	NV-MSVT Test Interpretive Flow Sheet, administered by Denney on May 19, 2021	Y
DX-61	RTBrockman_Medical_Records_0001891 (excerpt from RTBrockman_Medical_Records_0001883 – RTBrockman_Medical_Records_0001900)	MSVT Test Interpretive Flow Sheet, administered by Guilmette on July 13, 2021	Y
DX-62	RTBrockman_Medical_Records_0006274 (excerpt from RTBrockman_Medical_Records_0006271 – RTBrockman_Medical_Records_0006278)	MSVT Test Interpretive Flow Sheet, administered by Guilmette on October 2, 2021	Y
DX-63	-	NV-MSVT Test Interpretive Flow Sheet, administered by Denney on October 20, 2021	Y

Exh. #	Document Identifier	Description	Admitted
DX-64	-	MSVT Test Interpretive Flow Sheet, administered by Denney on October 26, 2021	Y
DX-65	DBD-0000110 – DBD-0000115	Victoria Symptom Validity Test, administered to Brockman by Denney on May 19, 2021	Y
DX-68	-	Dr. Park Dietz, Curriculum Vitae	Y
DX-72	-	List of all competency testing undergone by Mr. Brockman at DOJ request	Y
DX-74	UCSH 0210523	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2018	Y
DX-74A	UCSH 0210523	Video, Brockman Reynolds & Reynolds Texas Birthday Speech, Nov. 2018 (clip 4:55 – 6:16)	Y
DX-75A	-	Video of Dietz and Denney Exam (October) (GX-93) (clip – DX-6 transcript pg. 26:7 – 26:17)	Y
DX-75B	-	Video of Dietz and Denney Exam (October) (GX-93) (clip – DX-6 transcript pg. 55:18 – 56:11)	Y
DX-75C	-	Video of Dietz and Denney Exam (October) (GX-93) (clip – DX-6 transcript pg. 28:18 – 31:9)	Y
DX-75D	-	Video of Dietz and Denney Exam (October) (GX-93) (clip – DX-6 transcript pg. 26:7 – 27:6)	Y
DX-75E	-	Video of Dietz and Denney Exam (October) (GX-93) (clip – DX-6 transcript pg. 55:4 – 58:15)	Y

Exh. #	Document Identifier	Description	Admitted
DX-79	BCM-0001129 – BCM-0001134 (excerpt from BCM-0000001 – BCM-0001467)	09/11/2018 medical records from visit with Dr. Lerner	Y (filed under seal)
DX-80	RTBrockman_Medical_Records_0005049 – RTBrockman_Medical_Records_0005077	Dr. Pool's notes from visits with Brockman	Y (filed under seal)
DX-81	BCM-0000821 – BCM-0000822 (excerpt from BCM-0000001 – BCM-0001467)	10/16/2018 medical records from visit with Dr. Pool	Y (filed under seal)
DX-82	UCSH 0222949	5/5/2019 Email from Brockman to Dr. Pool	Y (filed under seal)
DX-83A	-	Dietz/Denney Exam Video – Day 3 (clip – DX-4 transcript pg. 44:19 – 46:24)	Y

Respectfully submitted on December 3, 2021.

/s/ Jason S. Varnado
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